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12 HEALTHCARE INC.

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

DAVID BAIN, DAYNA BAIN and ALAINA BAIN, individuals, ,

Plaintiffs,

vs.

UNITED HEALTHCARE INC. in its capacity as insurer, administrator, and fiduciary of the Sagent Advisors Inc. Group Health Plan, and SAGENT ADVISORS INC. GROUP HEALTH PLAN, an ERISA-regulated welfare plan,

Defendants.

CASE NO. 3:15-cv-03305-EMC

SECOND STIPULATION AND [PROPOSED] ORDER FOR ADDITIONAL TIME TO FILE JOINT DISCOVERY PLAN

Trial Date: None Set

The parties do hereby stipulate and request as follows:

On October 17, 2016, the Court granted the parties' stipulation for additional time to meet and confer regarding discovery and submit a joint discovery plan. (See Dkt. Entry 54.) The parties met and conferred during in the intervening two weeks regarding Plaintiffs' proposed discovery requests, and exchanged proposals for resolving their discovery disputes, and those discussions are continuing

The parties are presently finalizing the joint letter prescribed by the Court in its September 23, 2016, minute order. (Dkt. Entry 52). However, the parties regretfully will not be able to finalize the letter for filing on October 27, 2016.

4829-8004-7163.2

4:15-cv-03305-KAW

SECOND STIPULATION AND [PROPOSED] ORDER FOR ADDITIONAL TIME TO FILE JOINT DISCOVERY PLAN

1 The parties therefore agree that additional time is required in order to finalize their
2 determinations regarding what of the above-referenced discovery the parties can agree upon, and
3 what disputes they believe they will need the Court to resolve.

4 Therefore, the parties through their respective counsel do hereby stipulate and request that
5 the Court allow the parties one additional week to finalize their discussions, and order the parties
6 to file the joint discovery letter contemplated by the Court's September 23, 2016 Order (Dkt.
7 Entry 52) on or before November 3, 2016.

8 Respectfully submitted.

9 DATED: October 27, 2016

LEWIS BRISBOIS BISGAARD & SMITH LLP

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By: /s/ Timothy J. Nally

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Greg L. Johnson

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Timothy J. Nally

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Attorneys for Defendant UNITED
HEALTHCARE INC.

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2 **ORDER UPON STIPULATION**
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4 Pursuant to the stipulation of the parties and good cause appearing, the court hereby orders
5 that the parties shall file the joint discovery letter contemplated by Dkt. Entry 52 on or before
November 3, 2016.

6 It is so ORDERD.
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8 DATED: 10/28/2016
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